

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Aaron Abadi,

Plaintiffs,

-against-

American Airlines Group, Inc., *et al.*,

Defendant.

X

: Case No.: 1:23-cv-04033-LJL

: DECLARATION OF KAREN
CORNELIUS-SLATER IN SUPPORT
: OF ETIHAD AIRWAYS P.J.S.C.'S
MOTION TO DISMISS

:

:

:

X

I, Karen Cornelius-Slater, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.
2. I am the Manager Guest Relations & Baggage Claims of Etihad Airways P.J.S.C. (“Etihad”) with a business address of New Airport Road, Khalifa City A, Abu Dhabi, United Arab Emirates (“UAE”), and have been employed in this position since July 2018.
3. My duties and responsibilities include, but are not limited to, managing the team that receives and responds to all passenger complaints, including, but not limited to, complaints about Etihad’s ground, in-flight, and baggage services, including those received at the feedback@etihad.ae e-mail address.
4. I submit this Declaration in support of Etihad’s Motion to Dismiss.
5. I am familiar with the facts and allegations contained in Plaintiff’s Complaint and Supplemental Complaint and submit this Declaration based upon my personal knowledge and/or my review of the records of Etihad that are created and maintained in the regular course of its business.

6. Etihad is a corporation organized and existing under the laws of the UAE and the Emirate and Abu Dhabi and is engaged in the business of the carriage by air of passengers, baggage, and cargo.

7. Etihad maintains its headquarters and principal place of business in Abu Dhabi, UAE.

8. Etihad has never maintained a principal place of business in any city or country outside of Abu Dhabi, UAE, including any state in the United States, including New York or Texas.

9. Exhibit 42 of the Plaintiff's Complaint is a March 4, 2021 e-mail from the Etihad Guest Relations department, which is the department that I manage, to Aaron Abadi.

10. At all times relevant to the Complaint, Etihad Guest Relations was, and currently is, located in Abu Dhabi, UAE.

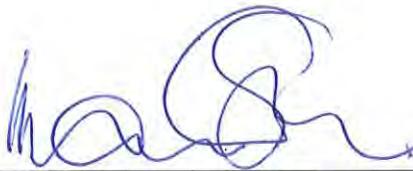
11. According to Etihad records, Aaron Abadi did not:

- a) make a reservation for travel on an Etihad flight between March 2021 and the present;
- b) enter into or purchase a contract of carriage for travel on an Etihad flight between March 2021 and the present; and
- c) did not travel on any Etihad flight between March 2021 and the present.

[INTENTIONALLY LEFT BLANK]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 14th day of November 2023 at
Abu Dhabi, United Arab Emirates



Karen Cornelius-Slater
Manager Guest Relations & Baggage Claims

